

1 **WEIL, GOTSHAL & MANGES LLP**  
2 Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
3 Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
4 Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
5 Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)|  
767 Fifth Avenue  
6 New York, NY 10153-0119  
Tel: 212 310 8000  
7 Fax: 212 310 8007

8 *Attorneys for Debtors*  
9 *and Debtors in Possession*

10 **KELLER & BENVENUTTI LLP**  
11 Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
12 Peter J. Benvenutti (#60566)  
(pbenvenutti@kellerbenvenutti.com)  
13 Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
14 650 California Street, Suite 1900  
15 San Francisco, CA 94108  
16 Tel: 415 496 6723  
17 Fax: 650 636 9251

18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 In re:

22 **PG&E CORPORATION,**

23 **- and -**

24 **PACIFIC GAS AND ELECTRIC COMPANY,**

25 **Debtors.**

26  Affects PG&E Corporation  
27  Affects Pacific Gas and Electric Company  
28  Affects both Debtors

29 \* *All papers shall be filed in the Lead Case,*  
30 *No. 19-30088 (DM).*

31 Case No. 19-30088 (DM)  
32 Chapter 11  
33 (Lead Case) (Jointly Administered)

34 **DECLARATION OF THEODORE E.**  
35 **TSEKERIDES IN SUPPORT OF**  
36 **DEBTORS' PRELIMINARY**  
37 **OPPOSITION TO TODD HEARN'S**  
38 **MOTION FOR RELIEF FROM**  
39 **AUTOMATIC STAY**

40 Date: December 17, 2019  
41 Time: 10:00 a.m.  
42 Place: United States Bankruptcy Court  
43 Courtroom 17, 16th Floor  
44 San Francisco, CA 94102

1 I, Theodore E. Tsekerides, pursuant to section 1746 of title 28 of the United States Code,  
2 hereby make the following declaration under penalty of perjury:

3 1. I am a Partner at Weil, Gotshal & Manges LLP, counsel to PG&E Corporation and  
4 Pacific Gas and Electric Company (the “**Utility**”) (collectively, “**PG&E**” or the “**Debtors**”) in the  
5 above-captioned chapter 11 cases (“**Chapter 11 Cases**”). I respectfully submit this *Declaration in*  
6 *support of the Debtors’ Preliminary Opposition to Todd Hearn’s Motion for Relief from Automatic*  
7 *Stay, filed on the date hereof. I am authorized to submit this declaration on behalf of the Debtors.*

8 2. Attached hereto as Exhibit A is a true and correct copy of a letter from Vince Magri  
9 to Todd Hearn, dated January 22, 2019.

10 3. Attached hereto as Exhibit B is a true and correct copy of a letter from Sumeet Singh  
11 to Todd Hearn, dated July 17, 2019.

12 Dated: December 12, 2019

13 /s/ *Theodore E. Tsekerides*  
14 Theodore E. Tsekerides